

# EXHIBIT A

**UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK**

BLAKE LIVELY,

Plaintiff,

v.

WAYFARER STUDIOS LLC, a Delaware Limited Liability Company, JUSTIN BALDONI, an individual, JAMEY HEATH, an individual, STEVE SAROWITZ, an individual, IT ENDS WITH US MOVIE LLC, a California Limited Liability Company, MELISSA NATHAN, an individual, THE AGENCY GROUP PR LLC, a Delaware Limited Liability Company, JENNIFER ABEL, an individual, JED WALLACE, an individual, and STREET RELATIONS INC., a California Corporation,

Defendants.

No. 1:24-cv-10049-LJL  
(Consolidated with 1:25-cv-00449-LJL)  
rel. 1:25-cv-00779-LJL

WAYFARER STUDIOS LLC, a Delaware Limited Liability Company, JUSTIN BALDONI, an individual, JAMEY HEATH, an individual, IT ENDS WITH US MOVIE LLC, a California Limited Liability Company, MELISSA NATHAN, an individual, JENNIFER ABEL, an individual, and STEVE SAROWITZ, an individual,

Plaintiffs,

v.

BLAKE LIVELY, an individual, RYAN REYNOLDS, an individual, LESLIE SLOANE, an individual, VISION PR, INC., a New York Corporation, and THE NEW YORK TIMES COMPANY, a New York Corporation,

Defendants.

**DECLARATION OF JAMES VITUSCKA**

I, James Vituscka, declare as follows:

1. I have personal knowledge of the facts set forth herein.
2. I am the “Daily Mail reporter” that authored the text messages that appear at paragraph 193 in the Wayfarer Parties’ Amended Complaint in this action. *See* ECF No. 50 ¶ 193.
3. In those text messages, my use of the phrase “sexually assaulted” was a mistake. I meant to say, “sexually harassed.” I regret this error.
4. Further, this phrase was in reference to the allegations in the complaint that Blake Lively filed with the Civil Rights Department in California. This phrase was not in reference to any conversation that I had with Leslie Sloane.
5. Ms. Sloane never told me that Ms. Lively was sexually harassed or sexually assaulted by Justin Baldoni or anyone else.
6. The Wayfarer Parties and their counsel did not consult me about what I meant by my use of the term “sexually assaulted.” I did not authorize the Wayfarer Parties or their counsel to include my text messages in their filings. I regret that private text messages were made public.

I declare under penalty of perjury that the foregoing is true and correct to the best of my knowledge and belief.

Dated: June 4, 2025

  
James Vituscka